

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
ELIZABETH VEGA RAMOS &
MARTIN RODRIGUEZ COLON
Monticielo, F10 Calle 6, Caguas 00725
SSN #xxx-xx-8084/xxx-xx-1157
Debtor(s)

CASE NUMBER: 17-03725 EAG

CHAPTER 11

D.I.P. *Third* REQUEST FOR EXTENSION OF TIME TO FILE PLAN
& DISCLOSURE STATEMENT

TO THE HONORABLE COURT:

NOW COME the above named debtors, through the undersigned attorney and respectfully pray as follows:

1. On **May 27, 2017** the above captioned debtor filed their petition under the dispositions of Chapter 11 of the Bankruptcy Code. The debtor is an individual and not a Small Business and will continue as debtor in possession pursuant to §1101 and §1107 of Title 11 of the United States Code.
2. The Status hearing was heard on **August 18, 2017** wherein **February 14, 2018** was set as the date by which the Plan and Disclosure Statement would be filed with the Court. This first date for the Plan of Reorganization was extended by this Court until **April 20, 2018** and was extended to a second extension until **June 19, 2018**.
3. Although virtually ready to file, the final computations by the Accountant have not yet been finalized and discussed with Counsel for debtor. The undersigned will once again meet with the Accountant tomorrow at which time it is expected that the exhibits needed to support the Plan will be discussed and review with the Accountant.
4. Both the office of the Accountant and of Counsel for debtor continue to suffer indirectly from the after effects of the hurricanes in the delay to finalize the supporting accounting for the timely filing of the Plan and the Disclosure Statement due on June 19, 2018.
5. The 2 professionals of the debtor will meet again with the debtors to discuss the payment under the Plan to be proposed this week.

4. Additionally, we continue to experience problems with the filing of the MOR for March and April and hope to resolve these also during the next week and after meeting with the Accountant tomorrow.

5. Under the circumstances debtor requests an additional 30 days, or at least until **July 19, 2018**.

WHEREFORE, D.I.P. respectfully prays for an extension of time to:

- a) submit the pending MORs until **July 20, 2018**;
- b) to submit the Plan and Disclosure Statement until **July 20, 2018**;
- c) any other remedy that this Court deems just and proper.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

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I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF Filing System which will send a notification, upon information and belief, of such filing to the U.S. Trustee and to all subscribed users & including the U.S. Trustee.

Dated: June 17, 2018.

Respectfully Submitted,

/s/ L. A. Morales

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For Debtors